



700 MHz Regional Planning Committee

Region 39, 700 MHz Regional Planning Committee
John Johnson, Chairman
3041 Sidco Drive
Nashville, TN 37204

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Filed Electronically

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WT Docket 96-86 *Comments*

Dear Ms. Dortch:

The Region 39, Tennessee, 700 MHz Regional Planning Committee supports rule changes to enable broadband deployment in the Upper 700 MHz Public Safety Block. In particular, we urge the Commission to fully consider all proposals to ensure public safety's access to future broadband technologies, including those proposals that call for reconfiguring the narrowband spectrum as assigned and developed by the Commission and the National Coordination Committee (NCC). In the few years since the proposal to allocate 700MHz spectrum to Public Safety, technological advances have required public safety to rethink the decisions it made in the NCC to best serve public safety. As regional planning entities empowered by the Commission to plan for and make available Commission allocated spectrum to eligible entities to meet the needs of today and tomorrow, it is our charge to request the Commission to evaluate all proposals with respect to these four objectives in today's terms as well as the environment that could be in place within the next few years: (1) maintaining mission-critical voice capability, (2) maximizing flexibility to adapt to new technologies, (3) maximizing spectrum efficiency, and (4) empowering public safety-commercial partnerships.

In choosing a broadband plan for the Upper 700 MHz Public Safety Block, the Commission should prepare now in order to be flexible in the future. It is essential to consider what public safety agencies need today as well as what they will need in the future. The time to evaluate and make changes is now, when the plans for public safety use of the Upper 700 MHz spectrum are only written on paper, rather than later, when they have been implemented and in use.

Our goals are the following:

- (1) Maintain at least the same amount of General Use, Interoperability and State Geographic 6.25 KHz spectrum ability for voice capability, including push-to-talk, with the quality, reliability, and security needed for mission-critical operations;

- (2) Region 39 is not opposed to a reconfiguration of the 700MHz public safety if the amount of narrowband 6.25 KHz voice channels remains the same or greater and there are no changes to the technical parameters, other than frequency changes, regarding the use and protection provided to these channels;
- (3) Maximize both financial and technical flexibility for public safety agencies to take advantage of current and future developments in broadband technology, including the use of commercial, off-the-shelf technology and technologies that require contiguous channels of up to 5 MHz (such as WCDMA, UMTS-TDD and potentially WiMAX);
- (4) Maximize broadband spectrum efficiency, which results in minimum spectrum dedicated to encumbering, non-flexible guard bands in the future environment;
- (5) Empower public safety and commercial broadband partnerships, including mixed-use networks with priority access for public safety agencies, as well as the opportunity for public safety agencies to lease their spectrum on a secondary basis;
- (6) Give maximum flexibility to the end user by allowing an entity to deploy a 50 KHz channel if that meets their need or aggregate the channels up to over 1 MHz if that best meets their needs;
- (7) If the Public Safety band is reconfigured, the reconfiguration rules be placed into effect as rapidly as possible. Since Region 39 has submitted our Plan to the FCC and is awaiting approval, any rules changes need to be made as quickly as possible to not impede implementation of planned systems or possibly cause a loss of grant funds.

We are particularly interested in exploring proposals that would consolidate public safety narrowband channels and give individual Regional Planning Committees the ability to control the size and location of guard bands between public safety narrowband and public safety broadband operations, regardless of whether the broadband operations are commercial or public safety.

One of the reasons such proposals are desirable is that they would set up a migration path for RPC's to use of the entire public safety allocation in the Upper 700 MHz band for broadband applications, at the option of the individual RPC. If narrowband channels were consolidated at the upper end of the public safety blocks, RPC's could, if they chose, adjust over time the position of the guard bands to enable additional broadband channels.

We understand that some have raised concerns about the cost of moving the narrowband channels. We do not expect these costs to be significant. Much of the work of coordinating these channels has already been done and will not need to be repeated. Specifically, RPC's have determined the number of channels each public safety agency will receive or the allotments in each county, and those decisions will not require revisiting. The RPC's will, however, need to revise in some cases the assignment of specific frequencies or allotment of channels to public safety agencies, a task that could be aided by the Computer Assisted Pre-Coordination Resource and Database System (CAPRAD), as operated by the National Law Enforcement Corrections Technology Center and the Denver Research Institute (DRI). While amending approved plans can be burdensome to regional planning committees, several of the

plans filed with the Commission and subsequently approved lack any wideband channel plans. Several of the regions filed comments that they were waiting for the completion of the TIA-902 standard before they would develop wideband 700 MHz channel allotments. Regardless of the reasons why, the lack of wideband channels in some of the approved plans indicates that filing plan amendments with the Commission is inevitable, if they are to utilize any of the 700 MHz wideband/broadband capabilities in the allocation.

The change of frequency assignments and allotments may require retuning of some radios, but to the extent that retuning of radios is necessary, hopefully it will be a relatively simple process since the radios are of the latest technology and can use a computer to reprogram them and should not have to be replaced. Certain network equipment, particularly at base stations, likely will need retuning or re-filtering, but very little network equipment has been deployed. The effort required to consolidate the narrowband channels would be minimized if it were undertaken as soon as possible, before many systems are deployed in the band and before additional RPC's finish the coordination process.

Region 39 does not agree with the Commission's assertion in the Seventh NPRM that the rules governing interoperability channels should be similar for wideband data and narrowband voice operations. The need for and use of narrowband interoperability channels for mission critical voice operations are well understood and accepted. The same does not exist for either wideband or broadband interoperability, especially under catastrophic disaster scenarios where the network infrastructure is destroyed.

We would also like to recommend that radios operating in the wideband / broadband non-interoperability radio spectrum not be required to support the interoperability channels or be required to have "must carry" interoperability capability.

Also after reviewing the Commission's 8th NPRM and attending several meetings and listening to the various proposals made by Lucient, Motorola and NPSTC, we can not conclude that any of these plans are best for Public Safety and ask the Commission to look for other ways that offer more flexibility to meet the needs of the end user.

In conclusion, Region 39 (1) does support the use of broadband technology, (2) does not oppose having to reconfigure the spectrum as long as it is completed rapidly and keeps at a minimum, the current amount of 6.25 KHz spectrum for narrowband voice, (3) does not support the "must carry" rules for wideband / broadband radio operating in non-interoperability spectrum.

Thank you for your consideration of these comments. We look forward to working with the Commission as it addresses these matters of great importance to public safety agencies.

Respectfully submitted,

John W. Johnson
Region 39 RPC Chairman